

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ANDREA L. NGO

Cases No. C-1-00-961

Plaintiff,

Judge Watson

v.

CITY OF CINCINNATI, et al.,

**JOINT DISCOVERY
PLAN PER RULE 26(f)**

Defendants.

All parties to this case, by and through their respective counsel, hereby jointly submit to the Court this Joint Discovery Plan pursuant to the Court's Calendar Order of November 4, 2004.

1. RULE 26(A) DISCLOSURES.

Rule 26(a)(1) have been made by the parties hereto or will be made by December 1, 2004.

2. DISCOVERY ISSUES AND DATES.

a. Discovery will need to be conducted on the issues of:

All claims made by Plaintiff, all of Defendant's defenses and damages.

b. The parties recommend that discovery need not be bifurcated.

c. Disclosure and report of Plaintiff's Expert(s) by 12/31/04.

d. Disclosure and report of Defendant(s) expert within Thirty days of any IME scheduled.

In light of the Calendar Order of the Court, the parties agree that if this action is not resolved by dispositive motion, the parties may continue discovery up to and including April 1, 2005.

Protective Order:

The parties do not anticipate the need for a protective order. If the parties subsequently deem that one is necessary, they will submit a joint proposed order to the Court.

In conformity with the Court's Calendar Order, any further amendments to the Complaint will be filed by November 25, 2004 unless otherwise ordered by the Court. Dispositive Motions are due by January 7, 2005.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2004, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following David E. Hardin @ davidhardin29@yahoo.com, counsel

/s/ Augustine Giglio

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